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July 16, 2004

Jeff Hagener, Director
Montana Fish, Wildlife & Parks
PO Box 200701
Helena, MT 59620-0701

RE: Management Plan and Conservation Strategies for Sage Grouse in Montana

Dear Mr. Hagener:

As the coordinator for the three local working groups established thus far to implement the Montana Sage Grouse Management Plan, I am writing to submit comments on the state plan.

At the last round of local working group meetings at each location, Dillon, Miles City, and Glasgow, participants assessed conditions in the field using the "Habitat Assessment Tools" in Appendix B of the final draft plan (issued 3-23-04). Participants at each field trip noted some problems or questions related to the tools in Appendix B. These are noted in detail in the field trip summaries attached to this letter.

Some general items that came up during each field trip:

- The "tools" are not self-explanatory. It is clear that on-site training is critical to a standardized approach.
- Even with training, there is some subjectivity to the approach, which of course is best tempered with considerable experience/knowledge of local bird habitat. For example, conducting an assessment of breeding habitat, requires a determination of when exactly in May-June to conduct the assessment.
- It isn't clear exactly who would use these forms or why. (Note however that the NRCS will be requesting landowners to conduct a habitat self-assessment as part of the CSP program that is being initiated in the lower Yellowstone River valley

in southeastern Montana. The NRCS participant from Miles City attended field trips in both Miles City and Glasgow.)

- On-the-ground assessments should take into account a variety of factors and conditions. It was noted, for example in Glasgow, that the field trip site area had a healthy bird population, but ranked as basically marginal or unsuitable habitat by using the assessment tools.

Most participants understand the need for good baseline data for assessing progress toward goals. It is also understood that the intent of Appendix B was to provide a standardized approach to habitat assessment.

In addition to these comments about Appendix B, raised by the local working group participants, the Cossitt Consulting Team which is providing coordination for the groups also noted discrepancies in Section VIII, which pertains to the local working groups. The schedules in the document do not reflect the current approach. The plan states that during the first year, the first three local working groups will be Dillon, Glasgow, and Broadus. In fact, the first three local working groups are Dillon, Glasgow, and Miles City.

No geographic boundaries for local working groups in the state plan, which has allowed for considerable flexibility for the local working groups in Dillon, Glasgow, and Miles City. Basically, anyone who has wanted to attend has been welcomed. In Dillon, we have participants from both Beaverhead and Madison counties. In Glasgow, participants are coming from Phillips and Valley County (and at one meeting we had a participant from the Fort Peck Indian Reservation. The Miles City area encompasses the southeastern corner of Montana, including Big Horn, Rosebud, Powder River, and Carter counties, as well as the Crow and Northern Cheyenne Indian reservations.

The broad swath of these local working groups does, however, raise the question, of whether the timeframe and location of subsequent local working groups will be as identified in the plan. It may make sense to ensure that the plan provides flexibility beyond the locations and schedule identified in Section VIII.

Please contact me if you have further questions regarding these comments.

Sincerely,

Anne Cossitt
Sage Grouse Local Working Group Coordinator

Attachments:
Field trip summaries from Dillon, Miles City, and Glasgow